

# EXHIBIT A

**Issued by the  
UNITED STATES DISTRICT COURT**

DISTRICT OF \_\_\_\_\_

Tammy Barker, et al

V.

Local 150, International Union of Operating Engineer

**SUBPOENA IN A CIVIL CASE**

Case Number:<sup>1</sup> 08 C 50015

5/7/08

TO: Linda Soria  
16152 South Leach Drive  
Homer Glen, Illinois 60491

5/7/08

- YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

- YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
3500 Three First National Plaza Chicago, Illinois 60602-4224	5/16/2008 1:00 pm

- YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

Any and all documents related to Local 150 International Union of Operating Engineers obtaining using or disclosing personal information from motor vehicle records commencing with any record generated after 1994.

PLACE	DATE AND TIME

- YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
Robert T. Hanlon <small>Digitally signed by Robert T. Hanlon DN: cn=Robert T. Hanlon, o=OurLaw Office of Robert Hanlon, email=rob@hanlonlaw.com, c=US Date: 2008-04-24 17:48:54 -05'00'</small>	

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER	
Robert T. Hanlon 14212 Washington Street, #200, Woodstock, Illinois 60098	

(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), on next page)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number





The Law Offices of  
Robert T. Hanlon & Assoc., P.C.  
14212 Washington Street, Unit B  
Woodstock, Illinois 60098  
815-206-2200

CARDINAL SAVINGS BANK, FSB  
70-73781

4/17/2008

To THE ORDER OF Soria, Linda

\$ \*\*50.00

Fifty and 00/100\*\*\*\*\*

DOLLARS

Linda Soria  
16152 South Leach Drive  
Homer Glen, IL 60491

Void after 90 days

Witness & Mileage Fee for #06-0400

10344 12719737880 0340006693

The Law Offices of Robert T. Hanlon & Assoc., P.C.

10344

Soria, Linda			Original Amt.	Balance Due	Discount	Payment
Date	Type	Reference	50.00	50.00		50.00
4/17/2008	Bill	#06-0400/41708			Check Amount	50.00
			4/17/2008			

Cardunal Savings ban Witness & Mileage Fee for #06-0400 50.00

The Law Offices of Robert T. Hanlon & Assoc., P.C.

10344

Soria, Linda			Original Amt.	Balance Due	Discount	Payment
Date	Type	Reference	50.00	50.00		50.00
4/17/2008	Bill	#06-0400/41708			Check Amount	50.00
			4/17/2008			

Cardunal Savings ban Witness & Mileage Fee for #06-0400 50.00

# EXHIBIT B

Law Offices of  
**ROBERT T. HANLON & ASSOCIATES, P.C.**  
14212 Washington Street, Suite 200  
Woodstock, IL 60098

*Robert Thomas Hanlon*

Phone 815-206-2200  
Fax 815-206-6184  
Email: rob@rhanlonlaw.com

May 5, 2008

✓ receipt  
5/12/08  
(SAT rec'd separately 5/1)

Mr. Dale D. Pierson, General Counsel  
IUOE, local 150, AFL-CIO  
Legal department  
6140 Joliet Rd.  
Countryside, IL 60525

Re: Subpoena, Barker *et al* v Local 150, IUOE, Case No. 08 C 50015

Dear Mr. Pierson:

Enclosed is copy of a Subpoena issued to Linda Soria in the above entitled cause for discovery deposition to commence at 1:00pm. On May 16, 2008 to be conducted at the offices of Ungaretti & Harris, 3500 Three First National Plaza, Chicago, IL 60602. I look forward to seeing you on the 16th.

Very truly yours,



Robert T. Hanlon

Cc: Bryan P. Diemer

# EXHIBIT C

## INTERNATIONAL UNION OF OPERATING ENGINEERS

LOCAL UNION NO. 150, 150B, 150A, 150C, 150RA, 150D, 150G, 150M

AFFILIATED WITH THE A.F.L.-C.I.O.

6140 JOLIET ROAD  
COUNTRYSIDE, IL 60525708-579-6663  
FAX 708-588-1647DALE D. PIERSON  
ELIZABETH A LAROSE  
MELINDA S HENSEL  
ROBERT E. ENTIN  
BRYAN P. DIEMER

## LEGAL DEPARTMENT

May 9, 2008

CHARLES R. KISER  
MARC R. POULOS  
ROBERT G. REITER, JR.  
MELISSA BINETTI  
LAUREN SHAPIRO  
KARL E. MASTERSVIA FAX AND REGULAR MAIL

Mr. Robert T. Hanlon  
 The Law Offices of Robert T. Hanlon & Assoc., P.C.  
 14212 Washington Street  
 Woodstock, IL 60098

VIA FAX AND REGULAR MAIL

Mr. Dean J. Polales  
 Ungaretti & Harris, LLP  
 3500 Three First National Plaza  
 Chicago, IL 60602

Re: Barker, *et al.* v. Local 150  
 Case No. 08 C 50015  
 Our File No. LI-00154

Dear Sirs:

This letter will confirm Defendant Local 150's request to reschedule the deposition of Linda Soria in the above case. As I stated to Mr. Polales in my telephone message, Local 150 asks that this deposition be rescheduled until Plaintiffs produce the affidavit of Ms. Soria referenced in their 26(a)(1) Disclosures as well as any other documents obtained from her and/or pertinent to her deposition. In any event, as you are probably aware, Local 150 is scheduled to file its Rule 56 motion and supporting materials in MES, et al. v. Local 150, et al., Case No. 05 C 50023, on that date and will be unable to attend the deposition.

Please contact me so that we might reschedule this deposition for a mutually convenient time and/or conduct a conference required by Rule 37.1 of the Local Rules for the Northern District of Illinois. Absent contact from either one of you on this issue, Local 150 will file an appropriate Rule 26 motion with the Court to be heard next Wednesday, May 14, 2008.

Very truly yours,

IUOE, LOCAL 150, AFL-CIO  
 LEGAL DEPARTMENT

Dale D. Pierson  
 General Counsel

DDP/lms

cc: William E. Dugan  
 Bryan P. Diemer (*via e-mail*)  
 Lauren S. Shapiro

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
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**INTERNATIONAL UNION OF OPERATING ENGINEERS  
LOCAL 150 LEGAL DEPARTMENT**

6140 JOLIET ROAD  
COUNTRYSIDE, ILLINOIS 60525  
PHONE: 708/579-6663  
FAX: 708/588-1647

**FAX COVER SHEET**

**DATE:** May 9, 2008

**TO:** Mr. Robert T. Hanlon

**FAX:** 815/206-6184

**FROM:** Dale D. Pierson

**RE:** Barker, *et al.* v. Local 150  
Case No. 08 C 50015

**NO. OF PAGES (INCLUDING COVER):** 2

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**MESSAGE:**

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\*\*\* TX REPORT \*\*\*  
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**INTERNATIONAL UNION OF OPERATING ENGINEERS  
LOCAL 150 LEGAL DEPARTMENT**

6140 JOLIET ROAD  
COUNTRYSIDE, ILLINOIS 60525  
PHONE: 708/579-6663  
FAX: 708/588-1647

**FAX COVER SHEET**

**DATE:** May 9, 2008

**TO:** Mr. Dean J. Polales

**FAX:** 312/977-4405

**FROM:** Dale D. Pierson

**RE:** Barker, *et al.* v. Local 150  
Case No. 08 C 50015

**NO. OF PAGES (INCLUDING COVER):** 2

**MESSAGE:**